

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

|                                                                                                            |                                                                                                       |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| ERROL A. HENDERSON,<br><br>Plaintiff,<br><br>v.<br><br>PENNSYLVANIA STATE<br>UNIVERSITY,<br><br>Defendant. | Civil Action No. 4:21-cv-00872<br><br>(Honorable Matthew W. Brann)<br><br><i>Electronically Filed</i> |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|

**JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF  
TIME FOR DEFENDANT TO RESPOND TO PLAINTIFF’S AMENDED  
COMPLAINT**

WHEREAS, on May 12, 2021, Plaintiff Errol A. Henderson (“Plaintiff”) filed his Complaint in the above-captioned action (ECF No. 1);

WHEREAS, on May 25, 2021, Defendant The Pennsylvania State University (“Defendant”) executed a Waiver of the Service of Summons, making the deadline to respond to the Complaint July 23, 2021 (ECF No. 6);

WHEREAS, on July 19, 2021, Plaintiff filed an Amended Complaint;

WHEREAS, the parties have agreed to a 30-day extension from the date Plaintiff filed his Amended Complaint for Defendant to move or otherwise respond to the Amended Complaint;

WHEREAS, Defendant has not previously requested an extension of time to respond to any pleading; and

WHEREAS, because both parties agree to this extension, no party will be prejudiced by a 30-day extension of time.

Accordingly, the parties hereby stipulate to extend the deadline for Defendant to move or otherwise respond to Plaintiff's Amended Complaint to and including August 18, 2021.

**STIPULATED AND AGREED ON THIS 20th DAY OF JULY, 2021:**

/s/ Stephen G. Console  
Stephen G. Console (PA 36656)  
Rahul Munshi (PA 307548)  
CONSOLE MATTIACCI LAW, LLC  
1525 Locust Street, Ninth Floor  
Philadelphia, PA 19102  
Phone: 215.545.7676  
Fax: 215.814.8920  
console@consolelaw.com  
munshi@consolelaw.com

*Counsel for Plaintiff*

/s/ Sarah E. Bouchard  
Sarah E. Bouchard (PA 77088)  
Ali M. Kliment\* (PA 318988)  
Margaret M. McDowell\* (PA 322619)  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: 215.963.5000  
Fax: 215.963.5001  
sarah.bouchard@morganlewis.com  
ali.kliment@morganlewis.com  
margaret.mcdowell@morganlewis.com

Ami N. Wynne\*  
MORGAN, LEWIS & BOCKIUS LLP  
110 N. Wacker Drive  
Chicago, IL 60606  
Phone: 312.324.1000  
Fax: 312.324.1001  
ami.wynne@morganlewis.com

*\*Admitted pro hac vice*

*Counsel for Defendant*

Approved and so **ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

---

Matthew Brann, J.

**CERTIFICATION OF SERVICE**

I, Sarah E. Bouchard, hereby certify that on this 20th day of July, 2021, a true and correct copy of the Stipulation And [Proposed] Order For Extension Of Time For Defendant To Respond To Plaintiff's Amended Complaint was served upon the following by electronic filing with the Clerk of the United States District Court for the Middle District of Pennsylvania, and is available for viewing and downloading from the ECF system:

Stephen G. Console  
Rahul Munshi  
Console Mattiacci Law, LLC  
1525 Locust Street, 9th Floor  
Philadelphia, PA 19102  
console@consolelaw.com  
munshi@consolelaw.com

/s/ Sarah E. Bouchard  
Sarah E. Bouchard